

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ALEXANDER STYLLER, INTEGRATED COMMUNICATIONS & TECHNOLOGIES, INC., JADE CHENG, JASON YUYI, CATHY YU, CAROLINE MARAFAO CHENG, PUSHUN CHENG, CHANGZHEN NI, JUNFANG YU, MEIXIANG CHENG, FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL SERVICES COMPANY, HEWLETT-PACKARD FINANCIAL SERVICES (INDIA) PRIVATE LIMITED, HP INC., HEWLETT PACKARD ENTERPRISE COMPANY, and DAVID GILL

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

**DECLARATION OF PAUL A. SASO IN SUPPORT OF DEFENDANTS'  
MOTION FOR PARIAL SUMMARY JUDGMENT AND IN OPPOSITION  
TO PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Paul A. Saso, Esq., a member of the Bars of the States of New York and New Jersey, and admitted *pro hac vice* to the Bar of this Court, declare under the penalty of perjury as follows:

1. I am a Director with the law firm of Gibbons, P.C., co-counsel to defendants Hewlett-Packard Financial Service Company, Hewlett-Packard Financial Services (India) Private Limited HP Inc., Hewlett Packard Enterprise Company and David Gill in this matter. As such, I am familiar with the facts set forth herein.

2. I submit this declaration in support of Defendants' Motion for Partial Summary Judgment and in opposition to Plaintiffs' Motion for Partial Summary Judgment.

3. None of the April 2013 emails/privilege log entries cited by Plaintiffs [SOF ¶ 49; [Dkt. No. 332](#) at 10 n.4, citing Privilege Log Entries 410, 414, 416-17, 420, 427, 427-31, 433 and 446] relate to the verification report understood to have been submitted by H3C to the Chinese authorities (the "H3C Verification Report") and relied upon by Plaintiffs' expert, Dr. Fang.

4. Only two privilege log entries with the term "verification report" reference emails related to the H3C Verification Report, which had previously been submitted to the PSB.

5. Both of those emails are from July 2013, and Plaintiffs cite only one of them. [[Dkt. No. 332](#) at 10 n.4, citing Privilege Log Entry 651.]

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 30, 2020

By: /s/ Paul A. Saso  
Paul A. Saso, Esq.

**CERTIFICATE OF SERVICE**

I, Christina T. Lau, Attorney for Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett Packard Enterprise Company, and David Gill, hereby certify that the foregoing document was filed using the CM/ECF system and electronic notice will be sent to registered participants as indicated on the Notice of Electronic Filing (NEF) on April 30, 2020.

/s/Christina T. Lau  
Christina T. Lau